



THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

JAMES E. JOHNSON
Corporation Counsel

KERRI A. DEVINE
phone: (212)356-2214
cell: (646)629-3118
fax: (212)356-2019
email: kdevine@law.nyc.gov

June 3, 2020

By ECF

Honorable Katherine Polk Failla
United States District Court, Southern District of New York
40 Centre Street
New York, New York 10007

Re: Taveras v. City of New York, 20 CV 1200

Your Honor:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, attorney for defendants New York City, Dermot Shea, in his official capacity as Police Commissioner of the City of New York, Jonathan David, as Director of the New York City Police Department's ("NYPD") License Division, and Asif Iqbal, as Executive Director of the NYPD's License Division's rifle/shotgun section, in the above-referenced matter.

I am writing to request an extension of defendants' deadline to to serve and file a motion to dismiss the Amended Complaint which is currently due June 8, 2020. See Docket No. 16. This is the first request for such an extension which is being made due to the convergence of other deadlines as well as recent involvement in Covid-19 related litigation. Plaintiff's attorney consents to this request, as well as to the following proposed briefing schedule: defendants' motion to dismiss to be served and filed by July 22, 2020, plaintiff's opposition to be served and filed by August 24, 2020, and defendants' reply to be served and filed by September 9, 2020.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/

Kerri A. Devine
Assistant Corporation Counsel

cc: **By ECF**
Amy L. Bellantoni, Esq.